

1 MICHAEL J. SHEPARD (SBN 91281)

2 *mshepard@kslaw.com*

2 **KING & SPALDING LLP**

3 50 California Street, Suite 3300

3 San Francisco, California 94111

4 Telephone: +1 415 318 1221

5 KERRIE C. DENT (admitted *pro hac vice*)

6 *kdent@kslaw.com*

6 **KING & SPALDING LLP**

7 1700 Pennsylvania Avenue, NW, Suite 900

7 Washington, DC 20006-4707

8 Telephone: +1 202 626 2394

9 CINDY A. DIAMOND (SBN 124995)

10 *cindy@cadiamond.com*

10 **ATTORNEY AT LAW**

11 58 West Portal Ave #350

11 San Francisco, CA 94127

12 Telephone: +1 408 981 6307

13 Attorneys for Defendant

14 ROWLAND MARCUS ANDRADE

15
16 **UNITED STATES DISTRICT COURT**

17 **NORTHERN DISTRICT OF CALIFORNIA**

18 **SAN FRANCISCO DIVISION**

19 UNITED STATES OF AMERICA,

20 Plaintiff,

21 v.

22 ROWLAND MARCUS ANDRADE,

23 Defendant.

Case No. 3:20-cr-00249-RS

24 **DEFENDANT ANDRADE'S WITNESS
LIST**

25 Pretrial Conference: Jan. 22, 2025 | 9:30 a.m.

26 Trial: Feb. 10, 2025 | 9:00 a.m.

Court: Courtroom 3 | 17th Floor

Judge: Hon. Richard Seeborg

Defendant Andrade hereby submits his list of witnesses that may be called to testify during his case-in-chief during the trial of the above-captioned matter. Mr. Andrade reserves the right to call any witness listed on the government's witness list. Mr. Andrade further respectfully reserves the right to amend this list and disclose additional witnesses in a manner consistent with the Federal Rules of Criminal Procedure. Not listed here, because they have already been disclosed, are his expert witnesses.

1. Anticipated Case-In-Chief Witnesses

ID #	Name
1	Allaham, Joey
2	Cully, Warren
3	Davis, Barry
4	Fahy, John
5	Gregory, Amanda
6	Grimm, Bradford
7	Johnson, Kathy (potential summary witness)
8	Korf, Mordechai
9	Lee, Bryant (UCE 7410)
10	Lee, Christine
11	Martinez, Christopher
12	OCE 8026-SAC
13	Petkevich, Sergey
14	Poon, Terrence
15	Pugliese, Dylan
16	Ray, Christopher
17	Ruzicka, Karl
18	Takhar, Jasbir
19	Tinker, Jeffrey
20	Torres, Raul
21	Weissman, Arthur
22	Wooten, Randy

1 **2. Anticipated As-Needed Impeachment Witnesses**

2

ID #	Name
23	Fein, Brian
24	Ferrara, Peter
25	Hodges, Kelly
26	Koltuniak, Andrew
27	Kroll, Chase
28	Motley, Seaton
29	Quinn, Ethan
30	Rothschild, Beau
31	Sherman, Steve
32	Wong, Bryan
33	Wynar, Rohan
34	Zicherman, Eli

13 **3. Anticipated As-Needed Foundation and Authenticity Witnesses (Should the Parties
14 Fail to Stipulate)**

15

ID #	Name
35	Ahmed, Leena (UCE 7780)
36	Apollaro, Anthony
37	Armas, Elizabeth
38	Battle, Wes
39	Bierbauer, Erik
40	Clachko, Jeffrey
41	Danik, Jeffrey
42	Di Paolo, Paul
43	Donahoe, Brian
44	Fliderman, Sandy
45	Genao, Ana
46	Gupta, Ravi
47	Haljun, Gibbs
48	Kahrs, James

1	49	Landau, Robert
2	50	Lee, Bryant
3	51	Lehmberg, Emily
4	52	Maran, Cory
5	53	McCormack, Mike
6	54	McKenna, Mary
7	55	Melville, Ann
8	56	Migdall, Allan
9	57	Morgan, Brad
10	58	O'Brien, David
11	59	Oriji, Nddi
12	60	Prasievi, Alexander
13	61	Randall, John
14	62	UCE-7780
15	63	Woods, James

4. Anticipated As-Needed Witnesses Should Evidence of Alleged Market Manipulation, Prior Litigation, and AtenCoin be Admitted over Mr. Andrade's objection.

ID #	Name
64	Agrawal, Sachin
65	Clay, Jerrell
66	Cohen, David
67	Fulton, Patricia
68	Getz, George
69	Gray, Richard
70	Kresek, Barbara
71	Olsen, Eric
72	Verma, Nea
73	Westerfield, Lee

Respectfully submitted,

DATED: January 22, 2025

KING & SPALDING LLP

By: /s/ Michael J. Shepard
MICHAEL J. SHEPARD
KERRIE C. DENT
CINDY A. DIAMOND

Attorneys for Defendant
ROWLAND MARCUS ANDRADE